

EXHIBIT 1

R. STEPHEN HAYNES

MUNICIPAL JUDGE
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All Above:

Re: Deposition

Although I have not received a confirmation as to location and time, I regret that I will be unable to sit for deposition as previously agreed tomorrow if the deposition is still on. While I have not been included in any settlement discussions, I understand that there have been some efforts in that regard. However, I have been quite ill for the past three days and while I hoped that I would be well enough to attend, I am not. My doctor tells me that this is a stomach virus that is going around and runs its course after several days. While I am better, I have been unable to prepare and complete a meaningful proposal for a protective order as I advised Ray Vincent last week and I feel reasonably confident that I would not be able to complete an uninterrupted deposition. I expect that I would be able to appear next week.

It is my hope that we can agree regarding the limits of inquiry, specifically in reference to the applicable judicial privilege regarding questions and testimony directed at specific cases decided by me and the thought process that went into those unappealed decisions. In addition, I would decline by privilege to speculate on how I might decide a hypothetical case. Finally, while I remain the presiding judge in Valleybrook until August 1, 2023, I have taken an "end of term vacation" and the Associate Judge, who will at that time assume the Presiding Judge position, is now directing the policies and procedures for the Court. As a result, I have no input to provide regarding current policies and organization.

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Again, my apology for the continuance. I truly believed that I would be well enough to attend, but assure you that I am not at this time. Thank you for your consideration and I look forward to resetting the deposition upon my recovery and confirmation of a effective protective order.

Very truly yours,

R. Stephen Haynes,

RSH/ba